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April 10, 2003

Country of Origin Labeling Program

Agricultural Marketing Service

USDA, Stop 0249, Room 2092-S\1400 Independence Avenue, S.W.

Washington, D.C. 20250-0249

RE: Federal Register: October 11, 2002 (Volume 67, Number 198) Docket Number LS-02-13 "Establishment of Guidelines of the Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities and Peanuts Under the Authority of the Agricultural Marketing Act of 1946"

My name is Martin Arter and I currently serve as the President of Affiliated Foods Midwest Cooperative, Inc. We are a wholesale warehouse (two locations) servicing approximately 750 stores in a ten state region. I am writing to express to you in the strongest possible terms that the approach taken by these voluntary guidelines is unfair and burdensome to the retail grocery industry and to independent retailers and wholesalers in particular. They will impose tremendous cost burdens on industry and consumers, with absolutely no food safety benefits.

Government studies have shown that country-of-origin labeling proposals are costly for consumers, burdensome on the food industry, unenforceable by government agencies, and do not enhance food safety. The lack of food safety effectiveness is evidenced by that fact that these rules address only certain unprocessed meat, fish, fruit and vegetable commodities sold at retail, completely ignoring food sold in restaurants.

The entire program is fundamentally anti small business. Independent retailers and wholesalers will face disproportionately higher compliance costs compared to their larger competitors. I urge you to reject these costly, misleading country-of-origin labeling mandates.

Sincerely,

AFFILIATED FOODS MIDWEST COOPERATIVE, INC.

Martin W. Arter
President

MISSION POSSIBLE: TO PROVIDE THE RETAILER WITH GOODS AND SERVICES TO COMPETE, GROW, AND BE PROFITABLE.